

CHARLOTTE HOBBS MEMORIAL LIBRARY

Whistleblower Policy

PURPOSE

The Charlotte Hobbs Memorial Library (CHML) requires trustees, employees and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the CHML, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations. The purpose of this policy is to provide a process for persons to report instances of suspected illegal or wrongful conduct without fear of intimidation, harassment, discrimination or retaliation.

DEFINITIONS

Board of Trustees - The elected Board that supervises the affairs of the CHML.

Director - A salaried employee hired by the Board to manage and promote the CHML.

Whistleblower - A person who discloses suspected wrongful conduct.

Wrongful Conduct - For the purposes of this policy, Wrongful Conduct includes but is not limited to the following:

- a. Illegal conduct, including theft of money, property, or resources.
- b. Misuse of authority for personal gain or other non-CHML purpose.
- c. Fraud.
- d. Violations of applicable federal and state laws and regulations.
- e. Violations of CHML policies and/or procedures.

POLICY

1. Reporting. It is the responsibility of all trustees, staff and volunteers to report any known or suspected wrongful conduct.
 - a. Any person who has knowledge of wrongful conduct by an employee or volunteer or has reasonable cause to believe that such conduct or actions have occurred should report it simultaneously to the Director, President and Vice President of the Board of Trustees. If any of them are named in the complaint, they should recuse themselves.
 - b. If the Director is the person suspected of such conduct, it should be reported to the Vice President; and if the Board Vice President is the person suspected of such conduct, it should be reported to the Director.
 - c. Reports will be kept confidential to the extent possible, consistent with federal and state law and the need to conduct an adequate investigation and prevent or correct suspected actions.

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- d. Persons reporting suspected or alleged illegal or wrongful conduct or improper actions should be acting in good faith and have reasonable ground for believing their suspicions or allegations to be true. Any allegations that cannot be substantiated and can be reasonably determined to have been made maliciously or knowingly false will be considered serious misconduct subjecting the person to consequences for their action, including appropriate discipline of staff or volunteers.
2. Investigation
 - a. The President of the Board is responsible for investigating the conduct at issue, unless the President is the subject of the reported conduct, in which case that responsibility passes to the Vice President. If the Vice President is also a subject of the reported conduct, then the Director will refer the matter to another Board officer for investigation.
 - b. The Board Officer shall be responsible for administering this policy, overseeing an investigation, and reporting to the Board at regular Board meetings until the matter is resolved.
 - c. Confidentiality will be maintained to the extent practical and appropriate under the circumstances. If an investigation reveals that unlawful conduct has taken place, appropriate disciplinary action will be taken, up to and including suspension or discharge.
 3. No person who in good faith reports any suspected wrongful conduct shall suffer intimidation, harassment, discrimination or other retaliation. Retaliation is a serious violation of this policy and should be reported immediately. An employee who has been subject to an adverse employment action based on his/her their prior disclosure of alleged or actual wrongful conduct may contest the action by filing a written complaint of reprisal with the Director. If the allegations involve actions of the Director, an employee may contest the action by filing a written complaint of reprisal with the Vice President of the Board.
 4. This policy will be distributed to employees, Board of Trustee members, and desk volunteers upon appointment or hiring.
 8. A suggested reporting format is included in the accompanying Appendix A.

Adoption: This policy was adopted by the Board of the CHML on May 19, 2017; and amended February 17, 2021 and March 16, 2022.

On following page:

APPENDIX A: Suggested Whistle Blower Report Form (1 page)

(Note: While this suggested form is preferred, no report will be rejected on the basis of not having been submitted on this form. Use of this form is encouraged, as it will facilitate the efficient investigation and resolution of any reported conduct.)

